

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND**

**IN THE MATTER OF THE
SEARCH OF:
THE TARGET LOCATIONS**

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CASE NO. 10-183JKB; 10-184JKB;
10-185JKB; 10-186JKB;
10-187JKB

GOVERNMENT'S MOTION TO SEAL

Comes now the United States of America, by and through its Attorneys, Rod J.

Rosenstein, United States Attorney for the District of Maryland and Judson T. Mihok, Assistant United States Attorney for said District and hereby moves this Honorable Court for an Order sealing the affidavit submitted in connection with above-referenced search warrant and in support thereof states:

1. On January 22, 2010, United States Magistrate Judge James K. Bredar authorized the execution of search warrant upon the following location (hereinafter "Target" locations): (a) 38 Virginia Avenue, Edgewater, Maryland, 21037, for a black Pelican 1495 briefcase and its contents, to include: one black and white bandana with a hole cut-out in the center; and one 5 oz. bottle of KY Warming Jelly - Personal Lubricant; (b) the Anne Arundel County Police Department, 8495 Veterans Highway, Millersville, Maryland 21108, for a dark-colored nylon duffel bag (and its contents) as well as a black USB thumb drive, approximately 1" square; (c) the business known as "Rita's" located at 120 Mayo Avenue, Edgewater, Maryland 21037; (d) Cellco Partnership, dba Verizon Wireless, 180 Washington Valley Road, Bedminster, NJ 07921, for records (wherever stored) associated with phone number (410) 279-7953; and (e) AT&T, Suite 600, 4th Floor, West Tower 11760, U.S. Highway 1, North Palm Beach, FL 33408, for records (wherever stored) associated with phone number (443) 716-5879.

2. The affidavit submitted in support of the above-referenced search warrant contains information regarding an ongoing investigation relative to alleged violations of Title 18, United States Code, Sections 2251, 2252, 2252A et seq., and 2242(b). Disclosure of the affidavit at this time could seriously jeopardize the investigation as it would reveal names and identities of individuals connected to this investigation, including a minor female and a law enforcement officer. Further, continued investigation based on the results from these affidavit could reveal additional minor victims. Therefore, disclosure of the affidavit at this time would in all likelihood compromise the integrity of the investigation and could quite possibly jeopardize the outcome of the investigation.

WHEREFORE, the United States respectfully requests that the Court issue an ORDER sealing the affidavit in support of the above-referenced search warrant until further Order of this Court.

Respectfully submitted,

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